

CAROL A. SOBEL SBN 84483
COLLEEN M. MULLEN SBN 299059
JUSTINE SCHNEEWEIS SBN 305672
LAW OFFICE OF CAROL A. SOBEL
3110 Main Street, Suite 210
Santa Monica, California 90405
t. 310 393-3055 f. 310 399-1854
e. carolsobel@aol.com

FERNANDO GAYTAN SBN SBN 224712
SHAYLA R. MYERS SBN 264054
LEGAL AID FOUNDATION OF LOS ANGELES
7000 S. Broadway
Los Angeles, California 90003
t. 213 640-3983
f. 213 640-3988
e. smyers@lafla.org
Attorneys for Plaintiff CANGRESS

(ADDITIONAL COUNSEL ON NEXT PAGE)

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

CARL MITCHELL, MICHAEL
ESCOBEDO, SALVADOR ROQUE,
JUDY COLEMAN, as individuals; LOS
ANGELES CATHOLIC WORKER,
CANGRESS, as organizations,

PLAINTIFFS,

v.

CITY OF LOS ANGELES, a municipal
entity; LT. ANDREW MATHIS, SGT.
HAMER and SGT. RICHTER , in their
individual and official capacities,

DEFENDANTS.

Case No.: CV 16-01750 SJO (JPRx)

DECLARATION OF SHAYLA
MYERS IN SUPPORT OF
PLAINTIFFS' REPLY IN
SUPPORT OF PLAINTIFFS' EX
PARTE APPLICATION TO
STRIKE AND/OR SEAL
PUBLICALLY FILED
DOCUMENTS

Date: none
Time: none
Courtroom: 1

1 PAUL L. HOFFMAN SBN 071244
2 CATHERINE SWEETSER SBN 271142
3 SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
4 723 Ocean Front Walk
5 Venice, California 90291
6 t. 310 396-0731
7 f. 399-7040
8 e. hoffpaul@aol.com
9 e. catherine.sdshhh@gmail.com

10 ATTORNEYS FOR PLAINTIFFS

Declaration of Shayla Myers

1
2
3 1. I am an attorney at the Legal Aid Foundation of Los Angeles, and an
4 attorney of record in this matter. If called to testify as a witness, I could testify
5 competently to the information contained herein.

6 2. On April 8, 2016, in response to the City Attorney's representation that he
7 believed that the video was available only via special motion, I contacted the
8 Clerk's office for the Central Division of California, Western Division and spoke
9 to the Civil Intake clerk. I told him I was looking for a copy of a video that had
10 been manually filed in a case pending in the Central District, Western Division,
11 and that I wanted a copy of the video. The clerk informed me that the documents
12 could be accessed via the Records Department, and that I could walk into the
13 records office and request a copy.

14 3. I am attaching as Exhibit A the last email exchanged between Plaintiffs
15 and Defendants yesterday concerning sealing these items. Plaintiffs stated their
16 understanding that Defendants did not oppose the under seal filing of their ex
17 parte although they did oppose the ex parte itself. There was no response to this
18 email to clarify that this was not accurate.

19
20 I declare under penalty of perjury under the laws of the state of California that
21 the foregoing is true and correct. Executed this 8th of April, 2016 in Los Angeles,
22 California.

23
24 
25
26 Shayla Myers

Exhibit A

4/8/2016

Email: Mitchell v. City of Los Angeles



Catherine Sweetser <catherine.sdshhh@gmail.com>

Mitchell v. City of Los Angeles

Catherine Sweetser <catherine.sdshhh@gmail.com>

Thu, Apr 7, 2016 at 11:22 AM

To: Eric Brown <eric.brown@lacity.org>

Cc: Thomas Peters <thom.peters@lacity.org>, Carol Sobel <carolsobel@aol.com>, Shayla Myers <SMyers@lafla.org>, Terry Lee <terry.lee@lacity.org>

Thank you for getting back to me. We will inform the court that you do not oppose the court allowing us to file our application to strike under seal but you do oppose our application to seal the videos.

On Thu, Apr 7, 2016 at 11:17 AM, Eric Brown <eric.brown@lacity.org> wrote:
Catherine,

We do not believe there are grounds to make the request to strike under seal. Accordingly, we will not stipulate to that form of filing.

However, as a professional courtesy, if you make the request to the Court to file under seal, we will not oppose it.

Eric